

## **REMARKS/ARGUMENTS**

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

### **I. STATUS OF THE CLAIMS AND FORMAL MATTERS**

Claims 2-7 and 32-37 are pending in this application. Claims 2, 4, 6, 32, 34 and 36, which are independent, are hereby amended. Claims 1, 8-31, and 38-53 have been canceled without prejudice or disclaimer of subject matter. No new matter has been introduced by this amendment. Support for this amendment is provided throughout the Specification. Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which the Applicants are entitled.

### **II. REJECTIONS UNDER 35 U.S.C. §102(b)**

Claims 2, 4, 6, and 32-37 were rejected under 35 U.S.C. §102(b) as allegedly anticipated by U.S. Patent No. 5,990,941 to Jackson, et al.

### **III. REJECTIONS UNDER 35 U.S.C. §103(a)**

Claims 3, 5, and 7 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. Patent No. 5,990,941 to Jackson, et al. in view of U.S. Patent No. 6,032,130 to Alloul, et al.

#### IV. RESPONSE TO 35 U.S.C. §102 REJECTIONS

Claim 2, recites, *inter alia*:

“...motion data generating means for generating motion data for controlling motion, which is felt by a user, corresponding to an image in accordance with said image data input via said input means.” (Emphasis Added)

As understood by Applicants, U.S. Patent No. 5,990,941 to Jackson, et al. (hereinafter, merely “Jackson”) relates to interactive display of any portion of a spherical image.

Applicants submit that the cited portions of Jackson, specifically column 10, lines 15-19, do not disclose the above-identified feature of claim 2. Applicants submit that the term “motion” in Jackson is simply referring to full motion video. Whereas, in the current application the motion data controls motion, which is movement felt by the user.

Therefore, Applicants submit that such disclosure does not render claim 2 unpatentable.

Furthermore, Applicants submit that nothing has been found in Jackson that would disclose or suggest the above-identified features of claim 2. Specifically, Applicants submit that Jackson fails to teach or suggest motion data generating means for generating motion data for controlling motion, which is felt by a user, corresponding to an image in accordance with said image data input via said input means, as recited in claim 2.

Therefore, claim 2 is patentable.

Applicants submit that Alloul, et al. does not provide the disclosure missing in Jackson.

For reasons similar to those described above, independent claims 2, 4, 6, 32, 34, and 36 are also patentable.

**V. DEPENDENT CLAIMS**

The other claims in this application are each dependent from one of the independent claims discussed above and are therefore believed patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

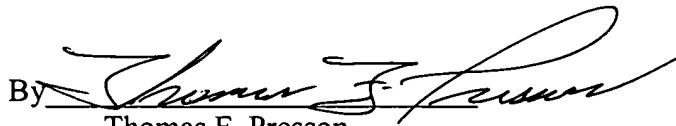
**CONCLUSION**

In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited references, it is respectfully requested that the Examiner specifically indicate the portion, or portions, of the reference, or references, providing the basis for a contrary view.

In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

Respectfully submitted,  
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